

Yasin M. Almadani (Cal. Bar No. 242798)  
ALMADANI LAW  
4695 MacArthur Ct., Suite 1100  
Newport Beach, CA 92660  
(949) 877-7177 | [YMA@LawAlm.com](mailto:YMA@LawAlm.com)

Ahmed Ibrahim (Cal. Bar No. 238739)  
AI LAW, PLC  
4695 MacArthur Ct., Suite 1100  
Newport Beach, CA 92660  
Tel: (949) 266-1240  
Fax: (949) 266-1280  
[abrahim@ailawfirm.com](mailto:abrahim@ailawfirm.com)

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

NAKIA V. PORTER, an individual on her own behalf and on behalf of her minor children, L.P. and A.P.; JOE BERRY POWELL, JR., an individual; and CLIFTON POWELL, on behalf of his minor child, O.P..

**Plaintiffs.**

V.

COUNTY OF SOLANO; SOLANO COUNTY SHERIFF'S OFFICE; SHERIFF THOMAS A. FERRARA, in his official capacity as Sheriff of Solano County; DEPUTY DALTON MCCAMPBELL, an individual; DEPUTY LISA MCDOWELL, an individual; SERGEANT ROY STOCKTON, an individual; DEPUTY CONNOR HAMILTON, an individual; DEPUTY CHRIS CARTER, an individual; CITY OF DIXON; DIXON POLICE DEPARTMENT; DIXON POLICE CHIEF ROBERT THOMPSON, in his official capacity as Dixon Chief of Police; OFFICER GABRIEL HOLLINGSHEAD, an individual, OFFICER AARON WILLIAMS, an individual, and DOES 1 to 10, inclusive.

## Defendants.

Case No. 2:21-CV-01473-KJM-JDP

**NOTICE OF FILING DOCUMENTS NO  
LONGER DEEMED CONFIDENTIAL BY  
DEFENDANTS REFERENCED IN OMNIBUS  
DECLARATION OF YASIN ALMADANI IN  
SUPPORT OF PLAINTIFFS' OPPOSITION  
TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Hon. Kimberly J. Mueller  
United States District Judge

## **Hearing Information:**

Date: December 12, 2024  
Time: 10:00 a.m.  
Judge: Hon. Kimberly J. Mueller  
Courtroom: 3, 15th Floor

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD**

2 Plaintiffs Nakia V. Porter, on behalf of herself and her two daughters, L.P. and A.P., and Joe Berry  
3 Powell, Jr. (collectively, “Plaintiffs”), by and through their undersigned counsel of record, hereby file  
4 Exhibits 208, 241, 242, 252, 255, 258, 263, 266, 267, 281, and 297 of the Omnibus Almadani Declaration  
5 in Support of Plaintiffs’ Opposition to Defendants’ Motion for Summary Judgment (hereafter, the  
6 “Exhibits”). *See* ECF 162. Defendants had previously designated the Exhibits as “Confidential” under  
7 the operative Stipulated Protective Order in place. *See* ECF 50. However, the parties have met and  
8 conferred and counsel for Defendants advised that Plaintiffs may proceed with the public filing of the  
9 Exhibits. Accordingly, a true and correct copy of the Exhibits is attached to this Notice.

10 Dated: October 22, 2024

11 ALMADANI LAW

12 /s/ Yasin M. Almadani  
13 Yasin M. Almadani, Esq.

14 AI LAW, PLC

15 /s/ Ahmed Ibrahim  
16 Ahmed Ibrahim, Esq.

17 *Attorneys for Plaintiffs*

# **Exhibit 208**

1 JUSTIN KIRK TABAYOYON, S.B.N. 288957  
2 **LAW OFFICES OF JUSTIN KIRK TABAYOYON**  
3 1000 North Texas Street, Suite A  
4 Fairfield, CA 94533-5661  
5 Telephone: 707.726.6009  
6 Facsimile: 925.826.3504  
7 justin@tabayoyonlaw.com

RECEIVED

MAY 18 2018

Solano Cty CAO  
**FILED**

2018-41

MAY 18 2018

5 Attorney for Claimant, **STEPHEN M. TALAMANTES**

6  
7 **STEPHEN M. TALAMANTES,**

8 Claimant,

9 And

10 **SOLANO COUNTY SHERIFF**

11 **DEPARTMENT,**

12 Government Entity,

Birgitta E. Corsello, Clerk of  
the Board of Supervisors of  
the County of Solano, State of California

Deputy: *Myra Chireka*

13  
14 **CLAIM FOR DAMAGES**  
(GOVT C § 910)

15 TO THE SOLANO COUNTY SHERIFF DEPARTMENT, STATE OF  
16 CALIFORNIA:

17 You are hereby notified that STEPHEN M. TALAMANTES ("CLAIMANT") claims  
18 damages from the SOLANO COUNTY SHERIFF DEPARTMENT.

19 PUBLIC EMPLOYEE(S) CAUSING INJURY OR DAMAGE

20 The name and identity of the public employee causing CLAIMANT'S injuries and  
21 violating his constitutional rights under the described circumstances is Deputy D.  
22 McCampbell and Deputy Watts.

23 GENERAL DESCRIPTION

24 On or about November 23, 2017, Solano County Sheriff Department used  
25 excessive force and attacked CLAIMANT, causing him serious injuries. CLAIMANT  
sought medical treatment for injuries.

26 As a result of the officers' intentional and negligent actions under the color of the  
27 law and acting within the scope of their duties as sheriff deputies for the Solano County

1 Sheriff Department, CLAIMANT suffered severe emotional distress, pain and suffering,  
2 and other significant and permanent injuries. The full scope and extent of CLAIMANT'S  
3 physical injuries that were proximately caused by the officers' actions is currently  
4 unknown and may be fluid and degenerative.

5 Furthermore, acting in the scope of their duties, and due to inadequate training,  
6 improper supervision, and/or inadequate police department policies, both stated and  
7 tacit, the officers on scene acted under color of state law to deprive CLAIMANT of  
8 certain state and federal constitutionally protected rights, including, but not limited to:

- 9 a) the right to be free from unreasonable searches and seizures, including the right  
10 to be free from the use of excessive force and/or the right to receive reasonable  
11 medical care for serious injuries sustained as a result of the use of excessive  
12 force by law enforcement officers;
- 13 b) the right of freedom of speech, expression and/or association, and/or;
- 14 c) the right to equal protection of the law;
- 15 d) the right not to be deprived of liberty without due process of law; and/or
- 16 e) the right to be free from battery, false arrest, false imprisonment, and/or  
17 kidnapping.

18 UNLIMITED CIVIL CLAIM

19 This claim constitutes an unlimited civil case. CLAIMANT seeks general and  
20 special damages to be determined according to proof, punitive damages, and statutory  
21 damages. The amount claimed grossly exceeds \$10,000.

22  
23 NOTICES REGARDING CLAIM

24 All notices or other communications with regard to this claim should be sent to:

25 LAW OFFICES OF JUSTIN KIRK TABAYOYON  
26 1000 North Texas Street, Suite A  
27 Fairfield, CA 94533-5661

1 Dated: 5/18/2018

2  
3 **LAW OFFICES OF JUSTIN KIRK TABAYOYON**

4 By: Justin Kirk Tabayoyon

5 JUSTIN KIRK TABAYOYON

6 Attorney for Claimant

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# **Exhibit 241**

**Manietta, Daniel L.**

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**From:** [iaproblueteam@solanocounty.com](mailto:iaproblueteam@solanocounty.com)  
**Sent:** Friday, August 7, 2020 7:54 AM  
**To:** Sayre, Ronald C. <RCSayre@SolanoCounty.com>  
**CC:** West, Dax R. <DRWest@SolanoCounty.com>  
**Subject:** New Chain of Command Incident for Review - 20-2662

**Importance:** High

Cc: Lieutenant-Sheriff Dax West

**Dear Sergeant-Sheriff Ronald Sayre:**

A new Use of force incident entered by Sergeant-Sheriff Roy Stockton was routed to you for your review. Please sign into the Solano County Sheriff application to review this incident. Click the below link to sign in. If for some reason you cannot click the below link, please copy and paste the link into your web browser's address bar:

<http://cjisiapro01.cjis.sol/BlueTeam>

NOTE: Those individuals who have been Cc'd should also sign into Solano County Sheriff to view this incident.

This is an automatically generated email. Please do not reply to it.

**Manietta, Daniel L.**

---

**From:** Field Operations Homepage <CACSHF01@solanocounty.com>  
**Sent:** Friday, August 7, 2020 3:46 AM  
**To:** Sayre, Ronald C. <RCSayre@SolanoCounty.com>  
**Subject:** Significant Event Log - 20-2662

[Field Operations Homepage](#)

## 20-2662 has been added

[Modify my alert settings](#) | [View 20-2662](#) | [View Significant Event Log](#) | [Mobile View](#)

Case/CAD Number:: 20-2662

Year:: 2020

Date:: 8/6/2020 9:15 PM

Bureau: Patrol

Event Type:: Employee Injury

Narrative:: Deputy McCampbell and Deputy McDowell advised me that they sustained injuries while effecting a lawful arrest stemming from a traffic stop. A female suspect refused to follow commands to remain inside of her vehicle and exited her car. The suspect ignored commands from Deputies to stop, walked around the back of her car, and reached into the front passenger side of the vehicle where another occupant was. As deputies approached the suspect she walked back towards the driver's side door. Deputy McCampbell and Deputy McDowell attempted to detain her. The female suspect became combative and struck Deputy McCampbell in the face and neck causing a 2" scratch on his neck. During the altercation Deputy McCampbell sustained minor abrasions to his left knee and minor cuts to his right hand when he struck the suspect. Deputy McDowell sustained minor abrasions to her right knee during the alter cation. Photographs of their injuries were taken and attached to the report.

Athens was contacted and requested Deputy McCampbell ice his injured left knee and monitor his scratched neck for infection. Athens told him to seek medical attention at a later date if the injuries got worse.

Deputy McDowell was advised by Athens to ice her injured right knee and to elevate it if it becomes sore. She was told to seek medical attention at a later date if the injured area got worse.

IIPP-5 and DWC-1 forms were completed by both Deputy McCampbell and Deputy McDowell. Deputy McCampbell and Deputy McDowell were not put on any work restrictions and did not miss any work.

Sgt. Roy Stockton 1S21

Criminal Case-Investigations Notification: No

Criminal Case-Investigations Responded: No

PIO Notified:: No

Watch Commander Notified:: No

ID Responded for CSI: No

Probation Electronic Monitoring:: No

Last Modified 8/7/2020 3:42 AM by Stockton, Roy D.

# **Exhibit 242**

**Manietta, Daniel L.**

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**From:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Sent:** Wednesday, September 16, 2020 7:59 AM  
**To:** president@tri-citynaacp.org  
**CC:** Chief Tibbet <wtibbet@fairfield.ca.gov>; Chief Carli <john.carli@cityofvacaville.com>; Chief Roth <aroth@suisun.com>; Communication Publicity <communications@tri-citynaacp.org>; Secretary <secretary@tri-citynaacp.org>  
**Subject:** Re: The Black Live in Solano County Matter

Good Morning Mr. George,

I responded to your comment within two hours after you posted it (below) and as I stated I'm happy to discuss with you. I will call this morning.

Johnicon, I am sworn to protect all citizens of Solano County and that is exactly what I have done and will continue to do, while I am serving in this role. If you personally knew me you would know that I am a strong supporter of the African American community; in not only my words, but also my deeds. I find it shameful that this is the circumstance, by which we are to meet. Nonetheless, my record speaks for itself. The actions of the BLM folks that wished death upon the deputy sheriffs at the hospital upsets me, as equal to the actions of the police officer who put his knee on the neck of George Floyd. Both are reprehensible acts of malicious violence that must NOT be tolerated. My issue with the NFL is they, as other sports entities, have decided to take on political issues albeit one perspective, and not just play the game of which, they are paid to play by their employer. It is my prerogative not to watch those sports, until there is resolution of this matter. With that said, I posted this in anger, which is never a good thing; however, my post clearly states. It was with no intention, to upset members of my community. I would be happy to sit down with you and the Tri City NAACP, to hopefully parlay a fruitful dialogue regarding community matters of salience for the African American/ Black community. Now, it is I who expressly wants to be clear in my sentiments, as one who is the member of a diverse family: I DO NOT believe in any way that African Americans or members of the Black community, should be disposable, oppressed, be victims of racism, subjugated or marginalized, or racially objectified in any way. In my experience, 99.9% of the cops really do a good job, however we do have a few "bad apples" and one of them really can spoil the organization, in the community's eyes. It's paramount that you know this: when they are found in my agency they have been removed. Period. On the first day, when any deputy or correctional officer comes to work for me, I state, in no uncertain terms "that if anyone has any racist thoughts or sentiments, or sexual harassment ideologies and are found to act upon them ; they will no longer be working for one Thomas A. Ferrara." If you don't believe me, feel free to follow up with anyone that I have sworn in. I would love nothing more, again to have a sit down discussion with you about this further and meet you in person. Please in box me, if you're amenable.

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**From:** president@tri-citynaacp.org <president@tri-citynaacp.org>  
**Sent:** Wednesday, September 16, 2020 7:07:10 AM  
**To:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Cc:** Chief Tibbet <wtibbet@fairfield.ca.gov>; Chief Carli <john.carli@cityofvacaville.com>; Chief Roth <aroth@suisun.com>; Communication Publicity <communications@tri-citynaacp.org>; Secretary <secretary@tri-

citynaacp.org>

**Subject:** The Black Live in Solano County Matter

Good morning Sheriff Ferrara,

The Tri-City NAACP and the African Americans Community of Solano County is deeply concerned with the attached screenshot of a post you made on your Facebook page. It is in reference to the NFL's season opening presentation (link below), Los Angels County Sheriff Deputies ambushing (which we denounce) , and Individuals that stood outside their hospital celebrating this unfortunate attack and wishing that the Deputies die (which we also denounce).

I would like to meet with you today to fully understand what is is that you are actually boycotting. I could be reached directly at 707-819-7730. I look forward to your phone call.

<https://youtu.be/i30SdcfEpSE>

---

"Unmasking Injustice Everywhere"

Johnicon George, SR,  
President, Tri-City Branch NAACP

"I don't desire to run for any political office. My SOLE desire is to Liberate the poor & oppressed by Sharing the Love of Jesus Christ; Fighting for social justice; and Advocate for equality"

**- Inspired by Dr. Martin Luther King, JR**

[EXTERNAL Email Notice] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

# **Exhibit 252**

**Manietta, Daniel L.**

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**From:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Sent:** Friday, February 5, 2021 1:56 PM  
**To:** Banks, Rustin M. <RMBanks@SolanoCounty.com>; Cummings, Le'Ron J. <LJCummings@SolanoCounty.com>  
**Subject:** Re: new stories on Solano County Sheriff's Office

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---

**From:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Sent:** Friday, February 5, 2021 1:55:16 PM  
**To:** Banks, Rustin M. <RMBanks@SolanoCounty.com>; Cummings, Le'Ron J. <LJCummings@SolanoCounty.com>  
**Subject:** Fwd: new stories on Solano County Sheriff's Office

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**From:** Robertson, John (Sheriff's Department) <John.Robertson@CountyofNapa.org>  
**Sent:** Friday, February 5, 2021 1:47 PM  
**To:** Ferrara, Tom A.  
**Subject:** Fwd: new stories on Solano County Sheriff's Office

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**From:** Wofford, Henry <Henry.Wofford@countyofnapa.org>  
**Sent:** Friday, February 5, 2021 12:12  
**To:** Robertson, John (Sheriff's Department)  
**Subject:** new stories on Solano County Sheriff's Office

**FYI, the story on three percenters is beginning to gain traction.**

<https://www.rawstory.com/three-percenter-2650330955/>

<https://jezebel.com/chris-pratts-brother-sure-has-a-lot-of-buddies-who-are-1846207047>

Henry Wofford  
Napa County Sheriff's  
Public Information & Outreach Officer  
Cell (707) 339-7582



[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

# **Exhibit 255**

**Manietta, Daniel L.**

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**From:** Bingaman, Katrina L. <KLBingaman@SolanoCounty.com> on behalf of Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Sent:** Tuesday, February 16, 2021 8:57 AM  
**To:** Cummings, Le'Ron J. <LJCummings@SolanoCounty.com>  
**Subject:** Fw: Follow up inquiries from Open Vallejo

---

**From:** Scott Morris <scott.morris@gmail.com>  
**Sent:** Monday, February 15, 2021 11:56 AM  
**To:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Subject:** Follow up inquiries from Open Vallejo

Sheriff Ferrara:

I am writing my [recent article for Open Vallejo](#) regarding several members of the sheriff's office displaying support for the Three Percenter movement.

As you know, we reached out to your office well ahead of publication with extensive evidence of our findings and specific questions. However, you would not provide any comment. Instead, [after publication, you released a statement to other media publications saying that your employees were "targeted" by the article and you were "not aware of one instance where any of these employees acted in a manner that was portrayed in this article," which is not the case as I provided evidence ahead of time.](#)

Your contention appears to be that your employees merely intended to show support for the Second Amendment. However, the FBI regularly sends local law enforcement briefings about extremist groups prone to violence, including the Three Percenters. You and your employees, as law enforcement officers, should be aware of these briefings and the conclusions of federal authorities.

Most recently, federal prosecutors charged Ian Benjamin Rogers of American Canyon with possession of pipe bombs. Rogers had expressed intent to target California politicians. [Charging documents show that Rogers displayed a Three Percenter logo -- the same logo displayed by your deputies -- which FBI Special Agent Stephanie Minor wrote, "I know from my training and experience and my discussions with other agents experienced in domestic terrorism investigations that this sticker is commonly used by so-called 'Three Percenters,' people who ascribe to extreme anti-government, pro-gun beliefs."](#)

[I have the following questions about this:](#)

- [Do you disagree with Special Agent Minor's characterization of the logo?](#)
- [You indicated in your statement that you "had personal conversations with the employees in question" after learning about our findings -- will that be the extent of your investigation into this matter?](#)

- Do you have any concerns that your deputies, having displayed similar logos as a man arrested in a neighboring county for possession of bombs, are capable of investigating and enforcing domestic terrorism involving groups like the Three Percenters?

- Is it acceptable for deputies to continue to display this logo, as Deputy Dale Matsuoka does?

Please provide any response by Wednesday.

Thanks,

Scott

Scott Morris  
Writer/Reporter  
(510) 871-5114

[@oakmorr](https://scottmorris.news)  
[scottmorris.news](https://scottmorris.news)

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

# **Exhibit 258**

**Manietta, Daniel L.**

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**From:** CAO-Clerk <Clerk@SolanoCounty.com>  
**Sent:** Tuesday, February 16, 2021 9:02 AM  
**To:** Board of Supervisors - Announcements <BOSALL@solanocounty.com>; Corsello, Birgitta E. <BECorsello@solanocounty.com>; Huston, Nancy L. <NLHuston@solanocounty.com>; Emlen, Bill F. <WFEmlen@solanocounty.com>; Curry, Bernadette S. <BSCurry@solanocounty.com>; Scarlata, Carrie <CSScarlata@solanocounty.com>; Ferrara, Tom A. <Tferrara@solanocounty.com>  
**CC:** Draves, Alicia M. <AMDrades@solanocounty.com>; JimZSpering <jimzspering@cs.com>  
**Subject:** FW: Benicia Black Lives Matter letter in response to right wing extremism in the Solano County Sheriff's Office  
**Attachments:** BBLM letter in response to right wing extremism.pdf

Hello,

Please see below email correspondence and attachment, thank you.

**Veronica A. Lake**

Administrative Secretary (C)  
Clerk of the Board  
675 Texas Street, Suite 6500  
Fairfield, CA 94533  
Direct (707) 784-6126  
Fax (707) 784-6665  
[valake@solanocounty.com](mailto:valake@solanocounty.com)  
[www.solanocounty.com](http://www.solanocounty.com)



**From:** brandon greene <brandon.greene@live.com>  
**Sent:** Sunday, February 14, 2021 11:34 AM  
**To:** CAO-Clerk <Clerk@SolanoCounty.com>  
**Cc:** Hannigan, Erin <EHannigan@solanocounty.com>; Wilson, Michael L. <MLWilson@solanocounty.com>; Brown, Monica E. <MEBrown@solanocounty.com>; Meitzenheimer, Liat F. <LFMeitzenheimer@solanocounty.com>; Spering, Jim P. <JPSpering@solanocounty.com>; Vasquez, John M. <JMVASQUEZ@solanocounty.com>; Hamilton, Jennifer <JLHamilton@solanocounty.com>; Thomson, Skip <SThomson@solanocounty.com>; Winston, Alexandra <AWinston@solanocounty.com>; Nimat Grantham <21nimat@gmail.com>  
**Subject:** Benicia Black Lives Matter letter in response to right wing extremism in the Solano County Sheriff's Office

Greetings Supervisor Brown et. al.,

Please find attached a letter from Benicia Black Lives Matter in response to the recent reports of right-wing extremism within the Solano County Sheriff's Office.

We look forward to your response and are still awaiting a response to our letter re: the recall efforts.

Brandon Greene and Nimat Shakoor-Granham on behalf of Benicia Black Lives Matter

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## BENICIA BLACK LIVES MATTER

Symbolizing Unity & Human Relations

### **Solano County Board of Supervisors:**

Erin Hannigan: [ehannigan@solanocounty.com](mailto:ehannigan@solanocounty.com)

Monica Brown: [mebrown@solanocounty.com](mailto:mebrown@solanocounty.com)

Jim Spering: [jpspering@solanocounty.com](mailto:jpspering@solanocounty.com)

John Vazquez: [jmvasquez@solanocounty.com](mailto:jmvasquez@solanocounty.com)

Mitch Mashburn: [mhbashburn@solanocounty.com](mailto:mhbashburn@solanocounty.com)

### **Solano County Sheriff:**

Thomas A. Ferrara

530 Union Avenue, Suite 100

Fairfield, CA 94533

Cc:

### **City of Benicia Mayor & Council:**

Steve Young: [syoung@ci.benicia.ca.us](mailto:syoung@ci.benicia.ca.us)

Tom Campbell: [tcampbell@ci.benicia.ca.us](mailto:tcampbell@ci.benicia.ca.us)

Lionel Largaespada: [llargaespada@ci.benicia.ca.us](mailto:llargaespada@ci.benicia.ca.us)

Trevor Macenski: [tmacenski@ci.benicia.ca.us](mailto:tmacenski@ci.benicia.ca.us)

Christina Strawbridge: [cstrawbridge@ci.benicia.ca.us](mailto:cstrawbridge@ci.benicia.ca.us)

### **City of Benicia City Manager:**

Eric Upson: [eupson@ci.benicia.ca.us](mailto:eupson@ci.benicia.ca.us)

Dear Supervisors, Councilmembers and Governmental Leaders of the County of Solano and the City of Benicia,

We, the members of Benicia Black Lives Matter (BBLM), are writing you in response to a terrifying [report from Open Vallejo](#) detailing the existence and tacit support of right wing extremism within the leadership of the Solano County Sheriff's Office, as well as the underwhelming response from the Sheriff himself.

The report explains that Daniel "Cully" Pratt is in a leadership role within the Sheriff's department carrying the designation of Sergeant. As part of his side business, Sergeant Pratt is also an [ardent supporter of the 3%'er movement](#), making and sharing "wood carvings" with right wing iconography, one of which "resembles a California flag, but instead of a bear, it features hooks for (Solano County Sheriff Sergeant) Stockton's AR-15 rifle above the words, 'WILL NOT COMPLY.' Thirteen shotgun shells, arranged like the stars of the Betsy Ross flag, form a circle around the Roman numeral III."

In itself, this is incredibly troubling. Just weeks ago, on January 6, 2021, right wing extremists, [approximately a quarter of whom had law enforcement](#) and/or military backgrounds, attacked the United States Capitol. In October 2020, an anti-government group and others [plotted to attack the Governor of Michigan](#). The 7 suspects were arrested for plotting to storm Michigan's State Capitol and abducting the governor, prior to the presidential election, in a seeming [practice run for the US Capitol attack](#). The parallel between these attacks is not inconsequential. It has been widely reported for some time that right wing and [white supremacist groups have actively recruited from the ranks of the military and law enforcement](#).

From the Brennan Center Report titled **Hidden in Plain Sight: Racism, White Supremacy, and Far-Right Militancy in Law Enforcement**:

*In 2017, the FBI reported that white supremacists posed a "persistent threat of lethal violence" that has produced more fatalities than any other category of domestic terrorists since 2000. Alarmingly, internal FBI policy documents have also warned agents assigned to domestic terrorism cases that the white supremacist and anti-government militia groups they<sup>1</sup>.*

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<sup>1</sup> Id.

More stark than the Open Vallejo report, is the [response from the Solano County Sheriff](#)<sup>2</sup>:

*... I want to be clear – the employees targeted in this article all serve this agency and this community with passion and dedication. I am not aware of one instance where any of these employees acted in a manner that was portrayed in this article. When we initially got inquiries about this story, I had personal conversations with the employees in question because it is important to me that the women and men who work for Solano County Sheriff's Office are people of character and uphold the high standards I have set for this Office. The employees told me that their intention was to support the 2nd amendment and the U.S. Constitution. As we have seen with many other symbols, the "Three Percenter" logo has recently been linked to the rioters who broke into the U.S. Capitol. None of these employees were present for, nor do they support extremist organizations. Our office denounces any extremist organization. And if there is ever a time when a member of our office is displaying support to overthrow the government it will be dealt with swiftly. ...*

Sergeant Pratt has also denied his membership in anti-government organizations saying that, “*The picture taken in October 2016, linked to said article depicts symbols, at the time was believed to be strictly in support of the 2nd Amendment and Pro-American – not in any way extremist anti-government views.*”

This seems inconceivable, as a quick Google search would reveal to the Sergeant [that](#):

*A wing of the **militia movement** that arose as part of a resurgence of the militia movement in 2009. The term “Three Percenter” refers to the erroneous belief that only 3% of colonists fought against the British during the Revolutionary War—but achieved liberty for everybody. Three Percenters view themselves as modern day versions of those revolutionaries, fighting against a tyrannical U.S. government rather than the British. With anyone able to declare themselves a Three Percenter, the concept allowed many people to join who were not suited, physically or by inclination, to engage in paramilitary activities. The Three Percenter logo—the Roman numeral III—has become very popular among anti-government extremists<sup>3</sup>.*

**As members of BBLM and residents of Benicia and Solano County, we are writing to you to demand that you as leaders of Solano County and City of Benicia not only visibly and vocally condemn right wing extremism, but also pledge to conduct a full investigation both at the County level and at the City level to ensure that policies and procedures - including those focused on recruitment and disciplinary actions - are in place to actively expel these extremists from the ranks of law enforcement and to prevent their recruitment in the first place.**

---

<sup>2</sup><https://fox40.com/news/local-news/report-claims-members-of-solano-county-sheriffs-office-openly-supported-extremist-group/>

<sup>3</sup> <https://www.adl.org/resources/glossary-terms/three-percenters>

We further demand Solano County follow both the City of Benicia and Sonoma County in establishing an Office of Equity to solidify the county's commitment to equity and the eradication of racist ideology.

This report is as ironic as it is offensive given that Black Lives Matter chapters have been labeled as terrorists. Months ago,, in August 2020, we successfully advocated before our City Council to take measures to take the work of equity seriously. We were mostly greeted with support but we also faced some opposition. One council member took umbrage with language in the resolution that highlighted the culpability of the entire Minnesota Police Department in the death of George Floyd, despite elected officials in Minnesota making a similar declaration. Other opposition came via a joint statement from the Benicia Police Officers Association, Benicia Dispatcher's Association and the Benicia Police Management Association. The relevant part is as follows:

*“...we ask that before making a commitment to Black Lives Matter, an organization that at its core is an anti-police organization that promotes the defunding of police departments, you consider a commitment to your community and your employees.”*

While this commentary from the police associations was not indicative of the tremendous community support we received, it was reminiscent of a vocal minority of individuals who would prefer to question our lived experiences than to confront the past and current systemic racism that so deeply infects our nation.

We would hope that in these perilous times, where it is beyond dispute that the threat of right wing anti-government violence is far more likely to come from white men confusing their misguided actions and ideology for patriotism, that our government leaders and the associations within them would boldly decry, reject and eliminate these factions from their ranks.

**If the Sheriff's response is any indication, there is much work to be done. We demand and expect better. We await a reply and more importantly - bold and sustained action to be taken.**

Thank you,

Benicia Black Lives Matter

# **Exhibit 263**

**Manietta, Daniel L.**

---

**From:** Davis, Matthew A. <MADavis@SolanoCounty.com>  
**Sent:** Friday, April 16, 2021 10:49 AM  
**To:** Ferrara, Tom A. <Tferrara@solanocounty.com>; Dewall, Brad W. <BWDeWall@SolanoCounty.com>  
**CC:** Putney, Anne M. <AMPutney@SolanoCounty.com>  
**Subject:** FYI: Article - Solano County Sheriff Slammed Over Response To Claim Some Deputies Belong To Extremist Groups

Hello Sheriff Ferrara and Undersheriff De Wall, please see article below, FYI:

\*\*\*\*\*

## **Solano County Sheriff Slammed Over Response To Claim Some Deputies Belong To Extremist Groups**

*April 16, 2021 at 9:00 am / KPIX Channel 5 News / Bay Area*

Solano County Sheriff Thomas Ferrara has come under fire from critics claiming he hasn't been completely transparent when he said federal law enforcement cleared several of his deputies of being members of an extremist organization.

Ferrara told Benicia Black Lives Matter (BBLM) in a letter this week that the FBI "confirmed none of my employees are members of any extremist organizations."

This includes the Three Percenters militia group, which advocates for the Second Amendment and the right for private gun ownership, along with active resistance toward the U.S. government.

Ferrara and the Sheriff's Office have not released any official reports or documents supporting Ferrara's claim that his deputies were absolved of being part of an extremist organization.

"I'm not comfortable with the sheriff's response," said Nimat Shakoor-Granham, co-founder of BBLM, on Thursday. "(Ferrara) has proof that deputies in his office supported these groups in the past. You can take off the uniform but you can't take off the bias."

Three Percenters are an anti-government militia named after the mistaken idea that only 3 percent of the American colonists fought in the revolution against Great Britain.

Shakoor-Granham pointed to the firing of a Fresno police officer after he allegedly participated in a rally held by the far-right extremist group Proud Boys in mid-March. The officer was placed on leave the following day and then subsequently terminated.

"What other proof does this sheriff need?" she added. "The FBI has deemed militia organizations like this as terrorist groups."

In its letter, which was also directed at the Benicia City Council, BBLM demanded that Ferrara and the council "not only visibly and vocally condemn right wing extremism, but also pledge to conduct a full investigation

both at the County level and at the City level to ensure that policies and procedures – including those focused on recruitment and disciplinary actions – are in place to actively expel these extremists from the ranks of law enforcement and to prevent their recruitment in the first place.”

Brandon Greene, co-founder of BBLM, said Ferrara’s letter showed his unwillingness to weed out extremists in his office and be transparent about his investigation.

“Where is this FBI report?” asked Greene on Thursday. “Put it out to the public and community for scrutiny.”

The county did not respond to a request from this news organization to see the FBI report.

Both Greene and Shakoor-Grantham said the Solano County Board of Supervisors’ decision not to get involved is frustrating.

“The sheriff is almost emboldened by the lack of Board of Supervisor action,” Greene added.

Greene said BBLM sent a letter asking the board to do something, with Supervisor Monica Brown the only one to respond.

“(Supervisor) Monica Brown said the board didn’t have the power to investigate,” Greene said.

Greene says that isn’t true, as a newly enacted law, Assembly Bill 1185, allows the board to create a civilian sheriff oversight board and inspector general position. The board and inspector general would have subpoena power to investigate issues within the sheriff’s office.

Shakoor-Grantham and Greene said they have approached the board to have an item placed on the agenda to discuss the issues raised by the Open Vallejo investigation.

“So far, it’s been crickets,” Shakoor-Grantham said. “They won’t talk about it.”

A request for comment sent to the clerk of the Solano County Board of Supervisors wasn’t immediately returned on Thursday.

Ferrara continues to reject the findings from Open Vallejo’s investigation, claiming he found “no merit” in the allegations made in the report.

Open Vallejo originally reported that members of Ferrara’s office displayed imagery and support to the Three Percenters over social media during the past few years. Former Solano County sheriff’s Public Information Officer Daniel “Cully” Pratt, who owns a wood-working business, made a gun display rack for his colleague Sgt. Roy Stockton in 2016. Cully Pratt’s brother is well-known actor Chris Pratt.

The piece includes Three Percenter imagery, like 13 shotgun shells arranged in a circle around the Roman numeral III. It also has “WILL NOT COMPLY,” at the bottom of the display. Cully Pratt used the hashtag “.3percenter,” and “blackgunsmatter,” among others in the Instagram post.

Cully Pratt told The Vacaville Reporter in response to the Open Vallejo article that the symbols in the post were “believed to be strictly in support of the 2nd Amendment and Pro-America — not in any way extremist anti-government views.”

However, in the same year Cully Pratt unveiled his art on Instagram, Three Percenters from Idaho sent some of its members over to the Malheur National Wildlife Refuge in Oregon during an armed standoff with federal officials.

Stockton, who was recently elected to the Vacaville City Council, also sold leather products under the name High Brass Leather and another business. As of Thursday evening, the High Brass Leather website had been taken down. For a time, a product was displayed on the site showing a coiled snake and a Roman numeral three surrounded by 13 stars.

Open Vallejo also uncovered that Ferrara's office homeless outreach coordinator, Deputy Dale Matsuoka, under the name Matt Daley posted Three Percenter imagery over his social media.

With the lack of information coming from the Board of Supervisors and Ferrara's office, Shakoor-Grantham says she is fearful interacting with sheriff's deputies.

"I can't call the sheriff's office for support," she said. "I don't want them coming to my house. I'm a Black woman. It scares me."

\*\*\*\*\*

**Matthew A. Davis, M.A., M.P.A.**

*Senior Management Analyst / Public Communications Officer*

Solano County Administrator's Office

675 Texas Street, Suite 6500

Fairfield, CA 94533

Direct (707) 784-6111

[MADavis@SolanoCounty.com](mailto:MADavis@SolanoCounty.com)

[@CountyOfSolano](https://twitter.com/CountyOfSolano)

[@SolanoCountyPH](https://twitter.com/SolanoCountyPH)

[@SolanoSheriff](https://twitter.com/SolanoSheriff)



# **Exhibit 266**



<http://progressivedemocratsbenicia.com/>

“Equity and Justice for All”

Solano County Board of Supervisors  
Subcommittee on Diversity and Equity  
Supervisor John Vasquez  
Supervisor Erin Hannigan  
675 Texas St.  
Suite 675, 6<sup>th</sup> Floor  
Fairfield, CA 94533

**Re: Existence of Right-wing Extremism in Solano County Sheriff's Office**

Dear Supervisors Hannigan and Vasquez:

The Progressive Democrats of Benicia is a club chartered by the Solano County Democratic Central Committee. We want to thank the Board of Supervisors for creating the Subcommittee on Diversity and Equity, and thank each of you for agreeing to accept responsibility for setting up the Committee. I've been reviewing the minutes from the Board's September 22, 2020 meeting in which the discussion on creating the subcommittee occurred.

**PDB requests that the Subcommittee on Diversity and Equity submit a motion to the Board of Supervisors requesting the Board issue a public statement that condemns the presence of any white supremacy ideology in the Solano County Sheriff's office, or in any Solano County department. We make this request also in support of the March 19, 2021 email submitted to the Board by Brandon Greene and Nimat Shakoor-Grantham representing Benicia Black Lives Matter.** They ask that the Board take action in response to the existence of white supremacy support within Solano County law enforcement.

A motion from the Subcommittee and public statement from the full Board is warranted given recent investigative reporting by [Open Vallejo](https://openvallejo.org/2021/03/09/amid-calls-for-investigation-sheriff-stands-by-deputies-who-displayed-militia-support/) - <https://openvallejo.org/2021/03/09/amid-calls-for-investigation-sheriff-stands-by-deputies-who-displayed-militia-support/>, revealing that law enforcement officers in the Sheriff's office have displayed support for the Three Percenters, a group the FBI and U.S Department of Justice say supports violent resistance against the Federal government and supporters of the Three Percenters have been prosecuted for bombing and kidnapping plots across the U.S. Solano

County Supervisors must show their constituents they condemn right-wing extremism within Solano County departments and any support explicit or otherwise held by government employees.

During the Board's September 21, 2020 meeting, each of you expressed support for and the need to address equity and diversity in Solano County, expressing concern on tension in the County and the need to show leadership regarding equity and social issues. The City of Benicia took this step months ago, and will soon be hiring a Diversity and Equity Manager, an action initiated by Benicia Black Lives Matter as well. Other Solano County cities should do the same and a public statement from the Board would help encourage these cities to start.

**The Progressive Democrats of Benicia urges the Subcommittee to act upon the request from Benicia Black Lives Matter and submit a motion that the Board of Supervisors issue a public statement condemning white supremacy ideology in the Sheriff's Department and Solano County government.** In doing so it would be an example of the type of leadership you said earlier is needed on equity and social issues.

Respectfully submitted,

Ralph Dennis  
Chair, Progressive Democrats of Benicia  
2140 Via Media Ct.  
Benicia  
502-523-2872

# **Exhibit 267**

**Manietta, Daniel L.**

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**From:** president tri-citynaacp.org <president@tri-citynaacp.org>  
**Sent:** Friday, June 4, 2021 5:37 PM  
**To:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Subject:** FW: Talking Points for Call Into Solano Board of Supervisors Meeting  
**Attachments:** 5-4 Board of Supes Public Comments Template (1).docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Tri-City NAACP is now taking an independent direct action in this matter. While we agree with BBLM. We are organizing our own efforts to address this concern in our community.

The Struggle Continues, Keep Fighting!

----- Original message -----

From: Nimat Grantham <21nimat@gmail.com>  
Date: 6/4/21 4:49 PM (GMT-08:00)  
To: Vessels of Vallejo <vesselsofvallejo@gmail.com>, United Democrats <uniteddemocratssouthernsolano@gmail.com>, "Thomas Bilbo, Stonewall Chair" <chair@solanostonewalldemocrats.org>, Ralph Dennis <redennis5156@att.net>, voicesofvv@gmail.com, "president tri-citynaacp.org" <president@tri-citynaacp.org>, Louis Michael <louismichaeljr@gmail.com>, ruby goshert <ruby.goshert@gmail.com>  
Cc: brandon green <brandon.greene@live.com>, "Brandon L. Greene" <ihaveagreene@gmail.com>, Nancy Rothstein <nancyrothsteinphoto@gmail.com>, Jean Walker - Gmail <jeanius@gmail.com>, Krista Heredia <krista.heredia@gmail.com>, Matt Burns <mattburns756@gmail.com>, Sarah Westmoreland <sarahwestmoreland450@gmail.com>, "Tracey Dashjian, Ph.D." <ltseaydashjian@gmail.com>, Larissa Seay <clarissafseay@gmail.com>, Robert Johnson <ebony319@earthlink.net>, "Kashanna L." <kash21.kl@gmail.com>, Andre Stewart Comcast <stewart472@comcast.net>, Amira Barger <amirabarger@gmail.com>, Dori Maggart <dorimaggart@yahoo.com>, Nathalie <nathalie.arch@gmail.com>  
Subject: Talking Points for Call Into Solano Board of Supervisors Meeting

Hey There,

Please read the attached talking points for a call into the next (Tuesday, June 8th) Solano County Board of Supervisors meeting. Benicia Black Lives Matters (BBLM) has asked the Solano County Board of Supervisors and the Solano County Sheriff's department to investigate the support and engagement of 3%ers in the Solano County Sheriff's Department and to denounce Racism and Domestic Terrorist groups since February.

BBLM has also attempted to get this matter added onto the Board of Supervisors meeting agenda as an item to discuss since the first week of March.

There has been no response from the Board of Supervisors, other than presenting that they have no authority over the Sheriff's Department.

The Sheriff has responded that as far as he's concerned, there's no problem, and therefore, no need for action.

Supervisor Monica Brown tried once to add the item onto the agenda and was met with a wall of silence from the Board.

The reason the rest of the Board members feel so comfortable not supporting the item to be added to the agenda is because no one from their respective districts are calling in to their Board meetings and requesting that they add the item.

This is where you come in.

Please make the call on Tuesday morning to request that the item of adopting AB 1185 (oversight committee for the Solano County Sheriff's Department) be added to the Board's next general meeting agenda.

Someone has got to have oversight authority over the Sheriff's Department!

If you have any questions or concerns, please feel free to contact me or Brandon Greene, Esq.

Thank you.

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

# **Exhibit 281**

**Manietta, Daniel L.**

---

**From:** Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Sent:** Tuesday, September 28, 2021 11:54 AM  
**To:** Banks, Rustin M. <RMBanks@SolanoCounty.com>; Dewall, Brad W. <BWDeWall@SolanoCounty.com>  
**Subject:** Fwd: Previous lawsuit regarding Deputy Dalton McCampbell

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---

**From:** Scott Morris <scott.morris@gmail.com>  
**Sent:** Tuesday, **September 28, 2021** 11:41:35 AM  
**To:** Hawkins, Rexall L. <RLHawkins@SolanoCounty.com>; Ferrara, Tom A. <Tferrara@solanocounty.com>  
**Subject:** Previous lawsuit regarding Deputy Dalton McCampbell

Hi --

I understand that **Deputy Dalton McCampbell**, who was named in the Nakia Porter incident, was involved in another incident in 2017 that involved similar circumstances.

A lawsuit brought by Stephen Talamantes alleges that McCampbell made an aggressive takedown and punched him, then lied in reports claiming Talamantes took a fighting stance. The lawsuit states that Talamantes was charged with resisting arrest but the charge was later dropped. I understand the case was settled.

Was McCampbell investigated for this incident? What were the results of the investigation?

Thanks,

Scott

Scott Morris  
Writer/Reporter  
(510) 871-5114

[@oakmorr](#)  
[scottmorris.news](#)

**[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.**

# **Exhibit 297**

**Manietta, Daniel L.**

---

**From:** Harris, Jackson F., Jr. <JFHarris2@SolanoCounty.com>  
**Sent:** Monday, August 23, 2021 6:01 PM  
**To:** SHF, PIO Mailbox <SheriffPIO@SolanoCounty.com>  
**Subject:** Press Release  
**Attachments:** Press Release 082321.pdf

[gfaison@dailyrepublic.net](mailto:gfaison@dailyrepublic.net)  
[thansen@dailyrepublic.net](mailto:thansen@dailyrepublic.net)  
[bhicks@dailyrepublic.net](mailto:bhicks@dailyrepublic.net)  
[shiland@dailyrepublic.net](mailto:shiland@dailyrepublic.net)  
[amaginnis@dailyrepublic.net](mailto:amaginnis@dailyrepublic.net)  
[rkuntz@dailyrepublic.net](mailto:rkuntz@dailyrepublic.net)  
[arosenblatt@dailyrepublic.net](mailto:arosenblatt@dailyrepublic.net)

[kfu@theresporter.com](mailto:kfu@theresporter.com)  
[rbammer@theresporter.com](mailto:rbammer@theresporter.com)  
[nsestanovich@theresporter.com](mailto:nsestanovich@theresporter.com)  
[jrosenbaum@theresporter.com](mailto:jrosenbaum@theresporter.com)

[news@timesheraldonline.com](mailto:news@timesheraldonline.com)  
[criley@timesheraldonline.com](mailto:criley@timesheraldonline.com)  
[jbungart@timesheraldonline.com](mailto:jbungart@timesheraldonline.com)  
[tgase@timesheraldonline.com](mailto:tgase@timesheraldonline.com)  
[rfreedman@timesheraldonline.com](mailto:rfreedman@timesheraldonline.com)

[robin.mitchell@alphamediausa.com](mailto:robin.mitchell@alphamediausa.com)  
[jyoung@kuic.com](mailto:jyoung@kuic.com)  
[jeff.dorian@alphamediausa.com](mailto:jeff.dorian@alphamediausa.com)  
[donna.perry@alphamediausa.com](mailto:donna.perry@alphamediausa.com)  
[ron.brown@alphamediausa.com](mailto:ron.brown@alphamediausa.com)  
[PublicService@kuic.com](mailto:PublicService@kuic.com)

[editor@dixontribune.com](mailto:editor@dixontribune.com)  
[staff@independentvoice.com](mailto:staff@independentvoice.com)  
[riovistabeacon@gmail.com](mailto:riovistabeacon@gmail.com)  
[beniciaherald@gmail.com](mailto:beniciaherald@gmail.com)

[newsdesk@solanonews.net](mailto:newsdesk@solanonews.net)  
[matthew@solanonews.net](mailto:matthew@solanonews.net)  
[news@dailydemocrat.com](mailto:news@dailydemocrat.com)  
[local@bayareanewsgroup.com](mailto:local@bayareanewsgroup.com)  
[editor@davisenterprise.net](mailto:editor@davisenterprise.net)  
[newsroom@baycitynews.com](mailto:newsroom@baycitynews.com)

[sanfrancisco@ap.org](mailto:sanfrancisco@ap.org)  
[newstips@nbcbayarea.com](mailto:newstips@nbcbayarea.com)  
[jodi.hernandez@nbcuni.com](mailto:jodi.hernandez@nbcuni.com)  
[kgotv.desk@abc.com](mailto:kgotv.desk@abc.com)  
[newsdesk@kpix.com](mailto:newsdesk@kpix.com)  
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[newstips@foxtv.com](mailto:newstips@foxtv.com)  
[anna.bauman@sfchronicle.com](mailto:anna.bauman@sfchronicle.com)  
[sravani@sfchronicle.com](mailto:sravani@sfchronicle.com)  
[producers@kgoradio.com](mailto:producers@kgoradio.com)

[news@kovr.com](mailto:news@kovr.com)  
[news@kcra.com](mailto:news@kcra.com)  
[desk@abc10.com](mailto:desk@abc10.com)  
[news@fox40.com](mailto:news@fox40.com)  
[kuvsnews@univision.net](mailto:kuvsnews@univision.net)  
[news@kfbk.com](mailto:news@kfbk.com)  
[news@capradio.org](mailto:news@capradio.org)  
[sacramento@ap.org](mailto:sacramento@ap.org)

Solano County Sheriff Media Contacts,

Please see the attached PDF press release response to a federal lawsuit recently filed.

Thank you,

Lt. Jackson Harris